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**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re:  
PURDUE PHARMA L.P., *et al.*,

Debtors.<sup>1</sup>

Chapter 11

Case No. 19-23649 (RDD)

(Jointly Administered)

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**THE AD HOC COMMITTEE OF NAS CHILDREN'S JOINDER TO OPPOSITION OF  
THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS  
TO MOTIONS FOR STAY PENDING APPEAL**

The Ad Hoc Committee of NAS Children (the "NAS Committee"), by and through their respective undersigned counsel, respectfully joins the opposition (the "Opposition") filed by The Official Committee of Unsecured Creditors (the "Official Committee") of Purdue Pharma L.P., *et al.* (collectively, the "Debtors") to: (i) *Amended Memorandum of Law in Support of United States Trustee's Amended Expedited Motion for a Stay of Confirmation Order and Related Orders Pending Appeal Pursuant to Federal Rule of Bankruptcy Procedure 8007* [Docket No. 3801] (the

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<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

*“U.S. Trustee Motion”*); (ii) *Motion of the States of Washington and Connecticut for a Stay Pending Appeal* [Docket No. 3789] (the *“CT/WA Motion”*); (iii) *State of Maryland’s Motion for Stay of Confirmation Orders [3786, 3787] and Trust Advances Order [3773] Pending Appeal* [Docket No. 3845] (the *“MD Motion”*); (iv) the *Notice of Presentment of Joint Motion of Certain Canadian Municipality Creditors and Appellants and Certain Canadian First Nations Creditors and Appellants for the Granting by the Bankruptcy Court of a Stay Pending Appeals, Joinder to the Stay Motions of the Office of the United States Trustee and the State of Maryland, and Granting Related Relief* [ECF No. 3873] (the *“CMFN Motion”*); and (v) *Second Amended Memorandum of Law in Support of United States Trustee’s Amended Expedited Motion for a Stay of Confirmation Order and Related Orders Pending Appeal Pursuant to Federal Rule of Bankruptcy Procedure 8007* [ECF No. 3972] (the *“U.S. Trustee Second Amended Motion”* and, collectively with the U.S. Trustee Motion, the CT/WA Motion, the MD Motion, and the CMFN Motion, the *“Stay Motions”*).<sup>2</sup>

### **JOINDER**

1. The NAS Committee hereby joins the Opposition and its arguments as if fully set forth herein. The NAS Committee strongly agrees with the Official Committee, especially given that the confirmed Plan: (i) will provide compensation to victims of the opioid epidemic in a far more expedient fashion than if their claims were litigated in the tort system and (ii) will, with respect to abatement, fund desperately needed NAS research as well other entities providing support for the NAS community.

2. Lastly, the NAS Committee’s constituents, the most innocent victims of the opioid crisis, voted overwhelmingly in favor of the Plan. Although the monies dedicated to NAS children

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<sup>2</sup> Capitalized terms used and not otherwise defined in this Joinder shall have the meanings ascribed to such terms in the Opposition.

directly and indirectly (through the abatement trust) are a small portion of the Debtors' estates, many families supporting NAS children either directly or through adoption are hard-pressed for funds can use every dollar of support these children. Time makes a difference in children's lives. The NAS Committee therefore supports the arguments set forth in the Opposition and opposes the Stay Motions.

3. Nothing contained herein shall constitute a waiver of any rights or remedies of the NAS Committee under title 11 of the United States Code or applicable law, including, without limitation, the right to: (i) amend, modify, or supplement this Joinder, or (ii) raise any other additional arguments at a later date.

### **CONCLUSION**

4. The NAS Committee respectfully requests that the Court: (i) deny the Stay Motions; and (ii) grant such other and further relief as this Court deems just and proper.

Dated: October 22, 2021  
New York, New York

**LEVENFELD PEARLSTEIN, LLC**  
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